

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**RICHARD CROSBY,**

**Defendant.**

**Case No. 1:23-cr-00111-JPH**

**Judge Jeffrey P. Hopkins**

**JOINT STATUS REPORT**

The United States of America, by and through undersigned counsel, and on behalf of Defense counsel, respectfully submits this Joint Status Report pursuant to the Court's order of April 8, 2024 (ECF no. 25).

On October 26, 2023, the defendant was arrested based on a criminal complaint. He made his initial appearance that day. He was released on bond. On November 8, 2023, the Grand Jury returned an indictment, which charges the defendant with wire fraud, in violation of 18 U.S.C. § 1343 (counts 1-13); Social Security number fraud, in violation of 42 U.S.C. § 408(a)(7)(B) (counts 14-16); and aggravated identity theft, in violation of 18 U.S.C. § 1028A (counts 17-19). On November 16, 2023, the defendant was arraigned on the indictment, and he pled not guilty to all counts. On November 29, 2023, the government provided discovery to the defense (with occasional supplements thereafter).

The parties have engaged in plea discussions. Defense counsel has indicated that the defendant is likely interested in resolving the case with a plea agreement. To that end, counsel for the United States is drafting a plea agreement to present to the defense within the next few days.

The government's intention is to attach a 30-day deadline for the defendant to sign the plea agreement.

With this in mind, the parties respectfully ask the Court to set this case for a change-of-plea hearing in no less than 45 days from today's date. This will allow adequate time for the defense to review and consider the government's plea offer prior to the plea hearing.

Respectfully submitted,

KENNETH L. PARKER  
United States Attorney

*s/ Timothy Landry*

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Status Report was filed on the Court's electronic docket (CM/ECF) on April 9, 2024, and thereby served on all counsel of record.

*s/ Timothy Landry*

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Timothy Landry (MA 669554)  
Special Assistant United States Attorney